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Attorneys for Defendants
HAROLD CARTER, RAYMOND LOERA,
COUNTY OF IMPERIAL, AND IMPERIAL
COUNTY SHERIFF'S DEPARTMENT

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

ADRIANA FERNANDEZ,

Plaintiff,

v.

JAMES RAY MORRIS, HAROLD
CARTER, RAYMOND LOERA,
COUNTY OF IMPERIAL, IMPERIAL
COUNTY SHERIFF'S DEPARTMENT,
and DOES 1-100, inclusive,

Defendants.

Case No. 08-cv-601-H (PCL)

**JOINT MOTION AND STIPULATION TO
EXTEND DEFENDANTS COUNTY OF
IMPERIAL, IMPERIAL COUNTY
SHERIFF'S DEPARTMENT, HAROLD
CARTER, AND RAYMOND LOERA'S
TIME TO FILE A RESPONSIVE
PLEADING**

Plaintiff Adriana Fernandez ("Plaintiff") and Defendants County of Imperial, Imperial
County Sheriff's Department, Harold Carter, and Raymond Loera (collectively "Defendants"), by
and through their respective counsel, do hereby jointly move this Court to approve the parties'
stipulation as follows:

1. On July 16, 2008, this Court granted in part and denied in part the Defendants'
Motion to Dismiss Plaintiff's Complaint and, in doing so, granted Plaintiff 30 days from July 16,
2008 to amend her Complaint.

2. As of the date of this joint motion, Plaintiff has not decided whether she intends to file an Amended Complaint.

3. To avoid the time, effort, and expense of filing an Answer to Plaintiff's original Complaint and then possibly having to file an Answer to Plaintiff's Amended Complaint, the parties hereby stipulate that Defendants' time to file an Answer to Plaintiff's original Complaint shall be extended to August 25, 2008, which extends Defendants' deadline by 30 days and is 10 days after Plaintiff's deadline to file an Amended Complaint. In the event Plaintiff files an Amended Complaint, the parties hereby stipulate that Defendants shall have 20 days from the date the Amended Complaint is filed to file a responsive pleading to the Amended Complaint.

Dated: July 18, 2008

Liebert Cassidy Whitmore

By: _____/s/

Jesse J. Maddox
J. Scott Tiedemann
Judith S. Islas
Attorneys for Defendants
HAROLD CARTER, RAYMOND
LOERA, COUNTY OF IMPERIAL, AND
IMPERIAL COUNTY SHERIFF'S
DEPARTMENT

Dated: July 18, 2008

Burcham & Zugman, A.P.C.

By: _____/s/

David J. Zugman
Attorneys for Plaintiff
ADRIANA FERNANDEZ

The parties having agreed and the Court finding good cause thereon,

IT IS ORDERED THAT the Defendants' time to file an Answer to Plaintiff's Complaint or a responsive pleading to Plaintiff's Amended Complaint shall be extended in accordance with the terms set forth above.

Dated: July ___, 2008

United States Magistrate Judge
Peter C. Lewis

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Fresno, CA 93711

PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF FRESNO

I am employed in the County of Fresno, State of California. I am over the age of 18 and not a party to the within action; my business address is: 5701 N. West Avenue, Fresno, California 93711.

On July 18, 2008, I effectuated service of the foregoing document described as JOINT MOTION AND STIPULATION TO EXTEND DEFENDANTS COUNTY OF IMPERIAL, IMPERIAL COUNTY SHERIFF'S DEPARTMENT, HAROLD CARTER, AND RAYMOND LOERA'S TIME TO FILE A RESPONSIVE PLEADING on the following parties by electronically filing the foregoing with the Clerk of the United States District Court, Southern District of California using its ECF System, which electronically notifies them:

David J. Zugman
Burcham & Zugman, A.P.C.
964 Fifth Avenue, Suite 300
San Diego, CA 92101

Terry Singleton
Gerald Singleton
Singleton & Associates
1950 Fifth Ave., #200
San Diego, CA 92101

Executed on July 18, 2008, at Fresno, California.

I declare that I am employed by the office of a member of the bar of this Court at whose direction the service was made.

Susan Brown

/s/

Type or Print Name

Signature

LIEBERT CASSIDY WHITMORE
A Professional Law Corporation
5701 N. West Avenue
Fresno, CA 93711

PROOF OF SERVICE BY OVERNIGHT DELIVERY

I am a citizen of the United States and employed in Fresno County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 5701 N. West Avenue, Fresno, California 93711. On July 18, 2008, I deposited with Federal Express, a true and correct copy of the within documents:

JOINT MOTION AND STIPULATION TO EXTEND
DEFENDANTS COUNTY OF IMPERIAL, IMPERIAL COUNTY
SHERIFF'S DEPARTMENT, HAROLD CARTER, AND
RAYMOND LOERA'S TIME TO FILE A RESPONSIVE
PLEADING

in a sealed envelope, addressed as follows:

Steven M. Walker
Michael A. Driskell
Walker & Driskell
300 South Imperial Ave., Suite 9
El Centro, CA 92243

Following ordinary business practices, the envelope was sealed and placed for collection by Federal Express on this date, and would, in the ordinary course of business, be retrieved by Federal Express for overnight delivery on this date.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on July 18, 2008, at Fresno, California.

Susan Brown

Type or Print Name

/s/

Signature